

GHAJAR EXHIBIT 3

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18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 RICHARD KADREY, *et al.*,

22 Individual and Representative
23 Plaintiffs,

24 v.

25 META PLATFORMS, INC, a Delaware
26 corporation,

27 Defendant.
28

Case No. 3:23-cv-03417-VC

**PLAINTIFF TA-NEHISI COATES'S
SECOND SUPPLEMENTAL RESPONSES
TO DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff Ta-Nehisi Coates

SET NO.: One (Requests Nos. 24 [Second Supplemental], 69 And 70 [First Supplemental])

INTRODUCTION

Plaintiff Ta-Nehisi Coates (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from his Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without his permission

REQUEST FOR ADMISSION NO. 69:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

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Mohammed A. Rathur (*pro hac vice*)

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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 RICHARD KADREY, *et al.*,

16 Individual and Representative
17 Plaintiffs,

18 v.

19 META PLATFORMS, INC, a Delaware
20 corporation,

21 Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF JUNOT DIAZ'S SECOND
SUPPLEMENTAL RESPONSES TO
DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff Junot Diaz

SET NO.: One (Requests Nos. 24 [Second Supplemental], 67 And 68 [First Supplemental])

INTRODUCTION

Plaintiff Junot Diaz (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from his Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without his permission

REQUEST FOR ADMISSION NO. 67:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

Bryan L. Clobes (*pro hac vice*)

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Mohammed A. Rathur (*pro hac vice*)

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*Attorneys for Plaintiff Christopher Farnsworth and
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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
 Individual and Representative
 Plaintiffs,
 v.
 META PLATFORMS, INC, a Delaware
 corporation,
 Defendant.

Case No. 3:23-cv-03417-VC
 PLAINTIFF CHRISTOPHER
 FARNSWORTH'S SECOND
 SUPPLEMENTAL RESPONSES TO
 DEFENDANT'S FIRST SET OF REQUESTS
 FOR ADMISSIONS

1 PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

2 RESPONDING PARTY: PLAINTIFF CHRISTOPHER FARNSWORTH

3 SET NO.: ONE (Requests Nos. 26 [SECOND SUPPLEMENTAL], 74 and 75
4 [FIRST SUPPLEMENTAL])

5 **INTRODUCTION**

6 Plaintiff Christopher Farnsworth (“Plaintiff”) hereby serves his responses and objections
7 to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for
8 Admissions (the “Requests” or “RFAs”).

9 **SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS**

10 **REQUEST FOR ADMISSION NO. 1:**

11 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama
12 models that infringes YOUR ASSERTED WORKS.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

14 Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff
15 objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff
16 further objects to this Request as an improper subject of a Request for Admission.

17 Subject to and without waiving these general and specific objections, Plaintiff responds
18 that he will not admit or deny this Request, on the grounds that the information requested is not a
19 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the
20 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for
21 discovering Plaintiffs’ current knowledge or awareness.

22 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

23 Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff
24 objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff
25 further objects to this Request as an improper subject of a Request for Admission.

26 Subject to and without waiving these general and specific objections, Plaintiff admits
27 Request No. 26.

SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 26 based on the existence of material from his Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without his permission.

REQUEST FOR ADMISSION NO. 74:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

RESPONSE TO REQUEST FOR ADMISSION NO. 74:

Plaintiff objects to this Request as unreasonably cumulative of Requests for Admissions Nos. 9, 10, and 11. *See e.g., Thorpe v. Hearn*, No. 219CV1974KJMKJNP, 2022 WL 902891, at *5 (E.D. Cal. Mar. 28, 2022) (“Where requests for admission ... are unreasonably cumulative and duplicative of other discovery taken in the case, the requests do not serve the purpose of Rule 36(a) and are properly subject to objection.”) (internal citations omitted); *see also K.C.R. v. Cnty. of Los Angeles*, No. CV 13-3806 PSG SSX, 2014 WL 3433925, at *4 (C.D. Cal. July 14, 2014).

Subject to and without waiving these general and specific objections, Plaintiff admits that Plaintiff has entered into licensing agreements with Plaintiff’s publisher for the Asserted Works and directs Meta to the terms of such licensing agreements, which speak for themselves.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 74:

Plaintiff objects to this Request as unreasonably cumulative of Requests for Admissions Nos. 9, 10, and 11. *See e.g., Thorpe v. Hearn*, No. 219CV1974KJMKJNP, 2022 WL 902891, at *5 (E.D. Cal. Mar. 28, 2022) (“Where requests for admission ... are unreasonably cumulative and duplicative of other discovery taken in the case, the requests do not serve the purpose of Rule 36(a) and are properly subject to objection.”) (internal citations omitted); *see also K.C.R. v. Cnty. of Los Angeles*, No. CV 13-3806 PSG SSX, 2014 WL 3433925, at *4 (C.D. Cal. July 14, 2014).

Plaintiff objects to this Request to the extent it calls for a legal conclusion, is overbroad and to the

1 Subject to and without waiving these objections, Plaintiff ADMITS Request No. 75 to the
2 extent that he is the owner of those rights, but Plaintiff DENIES that publishers cannot serve as
3 intermediaries and DENIES any implication that publishers play no role in licensing copyrighted
4 works, including the acquisition of and use of such works in connection with LLMs.

5
6 Dated: December 27, 2024 Respectfully submitted,

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8
9 By: /s/ Rachel Geman

10 Rachel Geman

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 23:

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 23:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU have personally used one of Meta’s Llama models.

RESPONSE TO REQUEST NO. 25:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 RICHARD KADREY, *et al.*,

16 Individual and Representative
17 Plaintiffs,

18 v.

19 META PLATFORMS, INC, a Delaware
20 corporation,

21 Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF ANDREW SEAN GREER'S
SECOND SUPPLEMENTAL RESPONSES
TO DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff Andrew Sean Greer

SET NO.: One (Requests Nos. 24 [Second Supplemental], 70 And 71 [First Supplemental])

INTRODUCTION

Plaintiff Andrew Sean Greer (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from his Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without his permission

REQUEST FOR ADMISSION NO. 70:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

Bryan L. Clobes (*pro hac vice*)

Alexander J. Sweatman (*pro hac vice*)

Mohammed A. Rathur (*pro hac vice*)

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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 RICHARD KADREY, *et al.*,

16 Individual and Representative
17 Plaintiffs,

18 v.

19 META PLATFORMS, INC, a Delaware
20 corporation,

21 Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF DAVID HENRY HWANG'S
SECOND SUPPLEMENTAL RESPONSES
TO DEFENDANT'S SECOND AND THIRD
SET OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff David Henry Hwang

**SET NO.: One (Requests Nos. 24 [Second Supplemental], 69 And 70
[First Supplemental])**

INTRODUCTION

Plaintiff David Henry Hwang (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from his Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without his permission

REQUEST FOR ADMISSION NO. 69:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

Bryan L. Clobes (*pro hac vice*)

Alexander J. Sweatman (*pro hac vice*)

Mohammed A. Rathur (*pro hac vice*)

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 23:

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 23:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU have personally used one of Meta’s Llama models.

RESPONSE TO REQUEST NO. 25:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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11 *Plaintiffs and the Proposed Class*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 RICHARD KADREY, *et al.*,

16 Individual and Representative
17 Plaintiffs,

18 v.

19 META PLATFORMS, INC, a Delaware
20 corporation,

21 Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF MATTHEW KLAM'S
SECOND SUPPLEMENTAL RESPONSES
TO DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff Matthew Klam

SET NO.: One (Requests Nos. 24 [Second Supplemental], 67 And 68 [First Supplemental])

INTRODUCTION

Plaintiff Matthew Klam (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from his Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without his permission

REQUEST FOR ADMISSION NO. 67:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

Bryan L. Clobes (*pro hac vice*)

Alexander J. Sweatman (*pro hac vice*)

Mohammed A. Rathur (*pro hac vice*)

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11 *Plaintiffs and the Proposed Class*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 RICHARD KADREY, *et al.*,

16 Individual and Representative
17 Plaintiffs,

18 v.

19 META PLATFORMS, INC, a Delaware
20 corporation,

21 Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF LAURA LIPPMAN'S
SECOND SUPPLEMENTAL RESPONSES
TO DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff Laura Lippman

SET NO.: One (Requests Nos. 24 [Second Supplemental], 75 And 76 [First Supplemental])

INTRODUCTION

Plaintiff Laura Lippman (“Plaintiff”) hereby serves her responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from her Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without her permission

REQUEST FOR ADMISSION NO. 75:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

Bryan L. Clobes (*pro hac vice*)

Alexander J. Sweatman (*pro hac vice*)

Mohammed A. Rathur (*pro hac vice*)

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*Counsel for Individual and Representative
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S
SUPPLEMENTAL RESPONSES TO
DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF REQUESTS FOR
ADMISSION**

1 **PROPOUNDING PARTIES:** **Defendant Meta Platforms, Inc.**
2 **RESPONDING PARTIES:** **Plaintiff Sarah Silverman**
3 **SET NUMBER:** **Two (2)**

4
5 Plaintiff Sarah Silverman (“Plaintiff”) hereby supplements her responses to Defendant Meta
6 Platforms, Inc.’s (“Defendant” or “Meta”) Second Set of Requests for Admissions (the “Requests”
7 or “RFAs”).

8 **GENERAL OBJECTIONS**

9 1. Plaintiff generally objects to Defendant’s definitions and instructions to the extent they
10 purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

11 2. Plaintiff objects to the Requests to the extent they seek information or materials that are
12 protected from disclosure by attorney-client privilege, the work product doctrine, expert disclosure
13 rules, or other applicable privileges and protections, including communications with Plaintiff’s
14 attorneys regarding the Action.

15 Discovery in this matter is ongoing and Plaintiff reserves the right to amend, modify, or
16 supplement these responses with subsequently discovered responsive information and to introduce and
17 rely upon any such subsequently discovered information in this litigation.

18 **SUPPLEMENTAL RESPONSES TO INDIVIDUAL REQUESTS**

19 **REQUEST FOR ADMISSION NO. 24:**

20 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models
21 that infringes YOUR ASSERTED WORKS.

22 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 24:**

23 Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to
24 the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects
25 to this Request as an improper subject of a Request for Admission.

26 Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the
27 existence of material from her Asserted Work that purportedly is output from a Meta Large Language
28 Model and has been made publicly available without her permission.

Dated: December 27, 2024

By: /s/ Joseph R. Saveri

Joseph R. Saveri

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[continued on next page]

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11 *Plaintiffs and the Proposed Class*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 RICHARD KADREY, *et al.*,

16 Individual and Representative
17 Plaintiffs,

18 v.

19 META PLATFORMS, INC, a Delaware
20 corporation,

21 Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF RACHEL LOUISE SNYDER'S
SECOND SUPPLEMENTAL RESPONSES
TO DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff Rachel Louise Snyder

SET NO.: One (Requests Nos. 24 [Second Supplemental], 65 And 66 [First Supplemental])

INTRODUCTION

Plaintiff Rachel Louise Snyder (“Plaintiff”) hereby serves her responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from her Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without her permission

REQUEST FOR ADMISSION NO. 65:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

Bryan L. Clobes (*pro hac vice*)

Alexander J. Sweatman (*pro hac vice*)

Mohammed A. Rathur (*pro hac vice*)

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*Counsel for Plaintiffs and the Proposed
Class, Additional Counsel Listed Below*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
Individual and Representative
Plaintiffs,
v.
META PLATFORMS, INC, a Delaware
corporation,
Defendant.

Case No. 3:23-cv-03417-VC

PLAINTIFF LYSA TERKEURST'S SECOND
SUPPLEMENTAL RESPONSES TO
DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF LYSA TERKEURST

SET NO.: ONE (Requests Nos. 24 [SECOND SUPPLEMENTAL], 69 and 70
[FIRST SUPPLEMENTAL])

INTRODUCTION

Plaintiff Lysa TerKeurst ("Plaintiff") hereby serves her responses and objections to
Defendant Meta Platforms, Inc.'s ("Defendant" or "Meta") Second and Third Set of Requests for
Admissions (the "Requests" or "RFAs").

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta's Llama
models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff objects to the phrase “personally unaware” as unintelligible. Subject to and without waiving these objections, Plaintiff denies Request No. 24.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 26 based on the existence of material from her Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without her permission.

REQUEST FOR ADMISSION NO. 69:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the right to license the ASSERTED WORK(S) as training data for LLMs.

RESPONSE TO REQUEST FOR ADMISSION NO. 69:

Plaintiff objects to this Request as unreasonably cumulative of Requests for Admissions Numbers 9, 10, and 11. *See e.g., Thorpe v. Hearn*, No. 219CV1974KJMKJNP, 2022 WL 902891, at *5 (E.D. Cal. Mar. 28, 2022) (“Where requests for admission ... are unreasonably cumulative and duplicative of other discovery taken in the case, the requests do not serve the purpose of Rule 36(a) and are properly subject to objection.”) (internal citations omitted); *see also K.C.R. v. Cnty. of Los Angeles*, No. CV 13-3806 PSG SSX, 2014 WL 3433925, at *4 (C.D. Cal. July 14, 2014). Subject to and without waiver of the foregoing objections, Plaintiff admits that Plaintiff has entered into licensing agreements with Plaintiff’s publisher for the ASSERTED WORKS and directs Meta to the terms of such licensing agreements, which speak for themselves.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 70:

Plaintiff objects to this Request as unreasonably cumulative of Requests for Admissions Nos. 9, 10, 11, and 69. *See e.g., Thorpe v. Hearn*, No. 219CV1974KJMKJNP, 2022 WL 902891, at *5 (E.D. Cal. Mar. 28, 2022) (“Where requests for admission ... are unreasonably cumulative and duplicative of other discovery taken in the case, the requests do not serve the purpose of Rule 36(a) and are properly subject to objection.”) (internal citations omitted); *see also K.C.R. v. Cnty. of Los Angeles*, No. CV 13-3806 PSG SSX, 2014 WL 3433925, at *4 (C.D. Cal. July 14, 2014). Plaintiff objects to this Request to the extent it calls for a legal conclusion, is overbroad, and to the extent that it calls for privileged information.

Subject to and without waiving these objections, Plaintiff ADMITS Request No. 70 to the extent that she is the owner of those rights, but Plaintiff DENIES that publishers cannot serve as intermediaries and DENIES any implication that publishers play no role in licensing copyrighted works, including the acquisition of and use of such works in connection with LLMs.

Dated: December 27, 2024

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12 *Counsel for Individual and Representative*
13 *Plaintiffs and the Proposed Class*

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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 RICHARD KADREY, *et al.*,

19 Individual and Representative
20 Plaintiffs,

21 v.

22 META PLATFORMS, INC, a Delaware
23 corporation,

24 Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF JACQUELINE WOODSON'S
SECOND SUPPLEMENTAL RESPONSES
TO DEFENDANT'S SECOND AND THIRD
SETS OF REQUESTS FOR ADMISSIONS**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Plaintiff Jacqueline Woodson

SET NO.: One (Requests Nos. 24 [Second Supplemental], 83 And 84 [First Supplemental])

INTRODUCTION

Plaintiff Jacqueline Woodson (“Plaintiff”) hereby serves her responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Plaintiff objects that the term “personally unaware” is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these objections, Plaintiff DENIES Request No. 24 based on the existence of material from her Asserted Works that purportedly is output from a Meta Large Language Model and has been made publicly available without her permission

REQUEST FOR ADMISSION NO. 83:

Admit that YOU have not granted the publishers of YOUR ASSERTED WORK(S) the

1 Dated: December 27, 2024

By: /s/ Bryan L. Clobes

Bryan L. Clobes

Bryan L. Clobes (*pro hac vice*)

Alexander J. Sweatman (*pro hac vice*)

Mohammed A. Rathur (*pro hac vice*)

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